

201-15903

NCIC OPPT/DC/USEPA/US

Sent by: JuanB Perez

05/18/2005 11:45 AM

To NCIC HPV@EPA

cc

bcc

Subject Re: HPV Challenge Program, AR-201- Registration Number:

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US Environmental Protection Agency
Office of Pollution Prevention and Toxics Docket
Non-Confidential Information Center (MC 7407T)
(operated by ASRC Aerospace Corporation)
1301 Constitution Ave NW Room B146 EPA West
Washington DC 20460
phone 202-566-0280 * fax 202-566-0282 * e-mail oppt.ncic@epa.gov
NATALIE RUTHERFORD <NATALIE_RUTHERFORD@fmc.com>

RECEIVED
OPPT/CBIC
2005 MAY 19 PM 2:46



NATALIE RUTHERFORD

<NATALIE_RUTHERFORD@fmc.com>

05/17/2005 10:02 PM

To Rtk Chem@EPA, NCIC OPPT@EPA

cc

Subject HPV Challenge Program, AR-201- Registration Number:

FMC Corporation actively supports the EPA HPV Challenge Program, AR-201. On March 18, 2005 EPA posted comments regarding our December 30, 2004 submission for the following chemical:

- **CAS No. 1563-66-2** 2,3-Dihydro-2,2-dimethyl-7-benzofuranyl methylcarbamate

Please find FMC's response to EPA's comments attached below.

Do not hesitate to contact me if you have comments or questions regarding FMC's submission.

Sincerely,

Natalie Rutherford
Global Regulatory Manager
FMC Corporation
Agricultural Products Group
Phone: (215) 299-6680



Fax: (215) 299-6468 FMC Response to EPA Comments 17-May-05.doc

**FMC Response to EPA Comments on Chemical RTK HPV Challenge Submission:
2,3-Dihydro-2,2-dimethyl-7-benzofuranyl Methylcarbamate CAS No. 1563-66-2**

Physicochemical Properties (melting point, boiling point, vapor pressure, water solubility, and partition coefficient)

EPA Comment

Boiling point. The submitter needs to provide a temperature range of decomposition for this chemical.

FMC Response

FMC will revise the robust summary to include a temperature range of decomposition.

Environmental Fate (photodegradation, stability in water, biodegradation, fugacity)

EPA Comment

Biodegradation. EPA agrees with the submitter's implication that the standard ready biodegradation test is not needed, given that substantial hydrolysis will occur during the test, and instead suggests that the submitter provide available data on biodegradation in soil.

The hydrolysis data included under biodegradation should also appear in the Stability in Water section.

FMC Response

FMC agrees to provide available data on biodegradation in soil. FMC also agrees to include the hydrolysis data in the Stability in Water section.

Ecological Effects (fish, invertebrates, and algae)

EPA Comment

The submitter needs to conduct an algal toxicity test without the use of dispersant or provide existing measured data on an appropriate analog.

FMC Response

FMC agrees to conduct an algal toxicity test without the use of dispersant.

EPA Comment

Fish and Invertebrates. Water chemistry measurements such as hardness, dissolved oxygen, and pH were mentioned in the robust summary but the data were omitted. Information on effects seen and number of fish or daphnids affected at each concentration was not provided.

FMC Response

FMC agrees to add this information to the robust summary.